



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NEW YORK 10007

DEC - 6 2005

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. David McNichol, Program Manager
ISP Environmental Services, Inc.
1361 Alps Road
Wayne, New Jersey 07470

Re: LCP Chemicals, Inc. Superfund Site - Bill for Collection No. 023306T011

Dear Mr. McNichol:

Enclosed is a Bill for Collection No. 023306T011 ("Bill") in the amount of \$70,391.52 for costs paid by the U.S. Environmental Protection Agency ("EPA") in connection with the LCP Chemicals, Inc. Superfund Site ("Site") from June 1, 2004 to May 31, 2005. This Bill is being transmitted pursuant to the reimbursement provisions set forth in Section XX, paragraph 76 of the Administrative Order on Consent ("AOC") Index No. II-CERCLA-02-99-2015, signed by EPA and ISP Environmental Services, Inc. ("ISP") for the Site entered under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. §9601 *et seq.*

Also enclosed is a narrative statement concerning the costs contained in the Bill and a SCORPIOS Report—the latter being a computer-generated breakdown of the different categories of Site-related costs paid by EPA. The SCORPIOS Report was prepared using EPA's indirect methodology, whereby all direct costs for payroll and contracts are multiplied by a standard indirect rate of 30.30% determined for Region 2.

Pursuant to Section XX, Paragraph 76 of the AOC, you are responsible for remitting payment of the Bill within thirty (30) days from the date of your receipt of this Bill. Although the terms of the Consent Decree indicate that payment is to be made by certified check, EPA requests that the amount due be sent to EPA's account at Mellon Bank via electronic funds transfer ("EFT"). To effect this payment via EFT, please instruct your bank to remit payment to EPA by providing the following information to your bank:

- a. Amount of payment: **\$70,391.52**
- b. Title of Mellon Bank account to receive the payment: **EPA**
- c. Account code for Mellon Bank account receiving the payment: **9108544**
- d. Mellon Bank ABA Routing Number: **043000261**
- e. Name of remitter: **ISP Environmental Services, Inc**
- f. Case number: **II-CERCLA-02-99-2015**
- g. Site/spill identifier: **02-HU**

259317



To ensure that your payment is properly recorded, you should send a letter, within one week of the EFT, which references the date of the EFT, the payment amount, the name of the Site, the case number, and your name and address, to:

Mary Anne Rosa
Remedial Project Manager
Southern New Jersey Remediation Section
Emergency and Remedial Response Division
U.S. Environmental Protection Agency - Region 2
290 Broadway, 19th Floor
New York, NY 10007-1866

as well as to:

Muthu S. Sundram, Esq.,
Assistant Regional Counsel
Office of Regional Counsel
U.S. Environmental Protection Agency - Region 2
290 Broadway, 17th Floor
New York, NY 10007-1866

The United States reserves its right to recover any oversight costs incurred during the time period covered by this accounting but not included in this bill.

Finally, as indicated in past correspondence, under the Superfund Administrative Reform on improving the management of work performed by consenting parties, EPA has reaffirmed its commitment to conduct appropriate and cost-effective oversight while ensuring protective cleanups. EPA believes that maintaining an open dialogue with potentially responsible parties about oversight expectations and consenting-party performance can improve the efficiency of response actions and minimize the costs of oversight.

To this end, EPA would once again like to offer to discuss with you its plans for the oversight of ongoing work at the Site, and to provide you with the opportunity to suggest ways to effectively streamline the work and its oversight. Please contact Ms. Rosa at (212) 637-4407 within two weeks of receipt of this letter if you are interested in having a conversation with us regarding future oversight, or if you have any questions regarding this bill. Questions from your legal representative should be directed to Mr. Sundram at (212) 637-3148.

Sincerely yours,



Carole Petersen, Chief
New Jersey Remediation Branch

Enclosures

Enclosure I

**Summary of Costs Paid by EPA from June 1, 2004
through May 31, 2005 in Connection with
Administrative Order on Consent ("AOC") Index No. II-CERCLA-02-99-2015
LCP Chemicals, Inc. Superfund Site
Linden, New Jersey**

The costs outlined in this summary include EPA Regional oversight costs that have been paid from June 1, 2004 through May 31, 2005.

Payroll

This consists of direct EPA personnel charges for time spent by EPA employees in, among other activities, reviewing and commenting on deliverables and overseeing Settling Defendants adherence to the requirements of the AOC. See the Payroll section of the enclosed SCORPIOS Report.

Total Payroll Costs: \$17,400.01

Response Action Contract (RAC)

This item consists of costs paid by EPA in connection with work performed by Camp, Dresser & McKee (CDM) for oversight of ISP's performance of the work required under the AOC.

CDM Costs: \$36,648.95

Contract Laboratory Program (CLP)

This item consists of costs paid by EPA in connection with analytical services performed under the contract lab program related to split samples collected as part of the oversight of the work required by the AOC.

CLP Costs: (\$26.32)

Indirect Costs

Indirect costs are disbursements from the Superfund for the operation and management of the Superfund Program which are not direct costs (i.e., disbursements recorded in individual Superfund site accounts in EPA's financial management system). Indirect costs are allocated to particular Superfund sites by means of a methodology established by EPA-Headquarters. The enclosed SCORPIOS Report includes calculations of EPA's indirect costs.

Total Indirect Costs: \$16,368.88

Total EPA Oversight Costs from 6/1/2004 through 5/31/2005: \$70,391.52